

## REMARKS

Claims 49-81 are pending in the Application. Reconsideration is respectfully requested in view of the remarks below.

### **I. The § 102 Rejections**

Claims 49-81 were rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 5,987,463 ("Draaijer").

Applicant respectfully traverses the rejection.

Claim 49 recites a method for processing a query. In particular, the method includes receiving from a first computer system a request to process a query at a second computer system. The method further includes the second computer system utilizing metadata to process the query and generate a result for the query, in which the metadata utilized to process the query was not stored on the second computer system prior to the second computer system receiving the request to process the query.

*A. Draaijer Fails To Disclose Utilizing Metadata To Process a Query and Generate a Result for the Query, in which the Metadata Utilized to Process the Query Was Not Stored on the Second Computer System Prior to the Second Computer System Receiving the Request to Process the Query*

Draaijer discloses a local database server that includes a heterogeneous services module to selectively send requests to foreign processes based on the capabilities of the foreign processes (see Abstract). More specifically, referring to FIG. 2A, Draaijer discloses an architecture for a database server process that includes a heterogeneous services module 311. In operation, a client process 200 supplies a SQL statement to a

local server 202. The local server 202 performs conventional query processing when processing native requests for data directly accessible by the local server 202 – e.g., data stored in local database 306 (col. 4, ll. 31-40). The SQL statement sent by the client 202 may also require an operation to be performed by a foreign process, such as foreign database server 208 (col. 4, ll. 44-49). In such a case, the heterogeneous services module 311 is configured to map a particular database operation to a target foreign process based upon metadata definitions for the heterogeneous services stored within a data dictionary 220 (col. 6, ll. 59-64).

Draaijer, however, fails to disclose a second computer system utilizing metadata to process the query and generate a result for the query, in which the metadata utilized to process the query was not stored on the second computer system prior to the second computer system receiving the request to process the query (emphasis added). Instead, Draaijer discloses that the data dictionary 220 (which stores metadata definitions for mapping a database operation to a foreign process) is stored in the local database 306 (col. 8, ll. 20-22). As discussed above, the local database 306 is local to (and directly accessible by) to the local server 202. Consequently, Draaijer cannot disclose that the metadata utilized to process the query was not stored on the second computer system prior to the second computer system receiving the request to process the query, as required by claim 49.

Applicant respectfully submits that claim 49 (and the claims that depend therefrom), therefore, should be allowable over Draaijer.

*B. Other Independent Claims*

Claims 60 and 71 each incorporates limitations similar to those of claim 49.

Claims 60 and 71, and the claims that depend therefrom, are also allowable over Draaijer for reasons corresponding to those set forth with respect to claim 49.

*C. Dependent Claim 51*

Dependent claim 51 incorporates the limitations of claim 49 and further recites the query includes the data and the metadata required to process the query. In rejecting claim 51, the Examiner cites column 4, lines 29-40, column 6, lines 59-67, and column 8 lines 18-22 and 54-67 of Draaijer as disclosing this limitation. Applicant respectfully disagrees. In the cited portions, Draaijer clearly discloses that the data to be searched is either stored in the local database 306 of the foreign database 308, and that metadata definitions are stored in the data dictionary 220, as discussed above. Draaijer fails to disclose that the query includes the data and metadata required to process the query.


Applicant respectfully submits that dependent claim 51 is further allowable over Draaijer for at this reason in addition for those reasons discussed above in connection with claim 49.

Applicant respectfully submits that claims 49-81 are allowable over the reference cited above, and are in condition for allowance. Should any unresolved issues remain, the Examiner is invited to call the undersigned at the telephone number indicated below.

Respectfully submitted,  
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Date

  
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